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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF
THOMAS J. PARDINI IN SUPPORT
OF PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PARTIES'
SECOND AMENDED JOINT
PROPOSED PRETRIAL ORDER
(DKT. 2519)**

1 I, Thomas J. Pardini, declare as follows:

2 1. I am a member of the Bar of the State of California and an attorney at the law firm
3 of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal
4 knowledge and if called as a witness, I could and would competently testify to the matters set
5 forth herein. I make this declaration in support of Plaintiff Waymo LLC's Administrative Motion
6 to File Under Seal Parties' Second Amended Joint Proposed Pretrial Order (Dkt. 2519).

7 2. I have reviewed the following documents and confirmed that only the portions
8 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Appendix A to Amended Joint Proposed Pretrial Order	Entire Document
Appendix D to Amended Joint Proposed Pretrial Order	Blue Highlights

14 3. Appendix A is an exhibit list containing brief descriptions of thousands of exhibits
15 in this case, including those that contain highly confidential information regarding third party
16 vendors, some of whom have NDAs with Uber, interspersed throughout the exhibits list. This
17 information is not publicly known, and its confidentiality is strictly maintained. Defendants
18 request this information be sealed to protect these confidential business relationships from
19 disclosure and possible interference from competitors.

20 4. The blue highlights of Appendix D contain contact information of an individual
21 involved in this case, including a personal phone number and home address. Defendants seek to
22 seal this information in order to protect the privacy of this individual because this lawsuit is
23 currently the subject of extensive media coverage. Disclosure of this information could expose
24 this individual to harm or harassment.

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5. Defendants' request to seal is narrowly tailored to the portions of the Second Amended Joint Proposed Pretrial Order and supporting appendices that merit sealing.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 29th day of January, 2018 at San Francisco, California.

/s/ *Thomas J. Pardini*

Thomas J. Pardini